

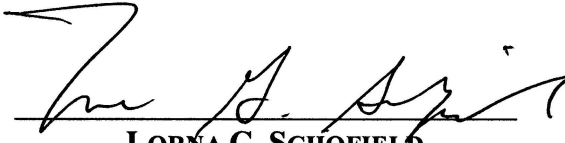
Application **GRANTED**. The conference scheduled for January 22, 2025, is **ADJOURNED to March 4, 2025, at 3:00 P.M.** The conference will be held IN PERSON at the Thurgood Marshall United States Courthouse, Southern District of New York, 40 Foley Square, New York, New York at Room 1106 before Judge Lorna G. Schofield. If lead counsel for any party is located outside of New York City or would experience a hardship from an in-person appearance and would prefer to appear remotely, they should notify the Court immediately by filing a letter on the docket so that arrangements can be made.

The parties' deadline to submit the joint letter and the proposed civil case management plan is extended to February 25, 2025.

Dated: January 15, 2025

VIA ECF New York, New York

Hon. Lorna G. Schofield
United States District Judge-SDNY
500 Pearl Street
New York, New York 10007



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: ***The Travelers Indemnity Company v. Underwriters At Lloyd's London severally subscribing to Policy No.: B1230AC08244A19***
Civil Action Number: 1:24-cv-08029
Our Matter Number: JRAC.2024036

Dear Judge Schofield:

The undersigned represents Underwriters At Lloyd's London severally subscribing to Policy No.: B1230AC08244A19 ("Underwriters"), in the above referenced matter. Travelers filed the Declaratory Judgment action on October 23, 2024. [D.E.1]. A Summons was issued and served against Underwriters. Counsel for Underwriters file a notice of appearance on January 10, 2025. [D.E. 9]. Please accept this correspondence as a Joint Request to Extend the Deadline to file a Discovery Plan, and the Initial Conference an additional forty-five (45) days.

It is the position of Underwriters' counsel that there are significant jurisdictional issues that may be at issue in this case. Underwriters' counsel has provided materials to Travelers' counsel to review. In addition, Underwriters' counsel has requested, but not yet received, information from Underwriters concerning the composition of one of the syndicates subscribing to No.: B1230AC08244A19. That syndicate is an unincorporated association, and as such, Travelers must establish diversity and satisfaction of the jurisdictional threshold as to each member of the syndicate. The information necessary to determine whether Travelers can satisfy this burden has been requested but is not yet available. Therefore, there continues to be potentially unresolved jurisdictional issue.

Pursuant to the Court Order dated December 4, 2024, there is a telephonic conference scheduled for January 22, 2025, and the parties are ordered to file a Discovery Plan and Joint Letter on ECF by January 15, 2025.

At this time, counsel for both parties are jointly requesting a 45-day adjournment of the telephonic conference and extension of the deadline to file a Discovery Plan and Joint Letter so as to allow the parties to continue to work towards determining whether the jurisdictional issue requires a transfer of venue to state court. The parties are making this request in the interest of judicial efficiency and to avoid unnecessary delays if this matter moves forward in the future.

Thank you in advance for your consideration.

Respectfully submitted,

A handwritten signature in cursive script that reads "Crystal Monahan".

Crystal Monahan